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March 18, 2025

VIA ECF

The Honorable Harvey Bartel III
United States District Judge
Eastern District of Pennsylvania
16614 U.S. Courthouse, Courtroom 16-A
601 Market Street
Philadelphia, PA 19106

Re: Atlas Data Privacy Corp. et al v. Quantarium Alliance, LLC et al.
Case No.: 1:24-cv-4098-HB
GRSM File No.: 1372660

Dear Judge Bartel:

This firm represents the interests of Defendants in the above-referenced matter. We write pursuant to Your Honor's January 22, 2025 Order calling for all pre-trial motions to be filed on or before March 18, 2025. *See* ECF No. 37. Defendants join in the consolidated motion to dismiss for lack of personal jurisdiction pursuant to Fed. R. Civ. P. 12(b)(2)¹(the "Personal Jurisdiction Motion") and the consolidated motion to dismiss for failure to state a claim pursuant to Fed. R. Civ. P. 12(b)(6)² (the "12(b)(6) Motion"). In accordance with Your Honor's January 22, 2025 Order, Defendants has also filing supplemental motion to dismiss for lack of personal jurisdiction pursuant to Fed. R. Civ. P. 12(b)(2). *See* ECF No. 41.

For the reasons set forth in the Personal Jurisdiction Motion, the 12(b)(6) Motion, and Defendants' supplemental motion to dismiss for lack of personal jurisdiction, Defendants respectfully request that the Court grant the motions in their entirety and dismiss Plaintiffs' Complaint with prejudice.

¹ *See Atlas Data Privacy Corp. et al. v. GoHunt LLC, et al.*, Case No. 1:24-cv-04380-HB, ECF No. 42.

² *See Atlas Data Privacy Corp. et al. v. We Inform, LLC et al.*, Case No. 1:24-cv-04075, ECF No. 59

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Respectfully Submitted,

GORDON REES SCULLY MANSUKHANI, LLP

/s/ Clair E. Wischusen

Clair E. Wischusen, Esq.

CC: All counsel of record via ECF